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Filing date: **06/29/2015**

IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	92059305
Party	Defendant Theodore A Stoner
Correspondence Address	MATTHEW H SWYERS THE TRADEMARK COMPANY PLLC 344 MAPLE AVE W, STE 151 VIENNA, VA 22180 UNITED STATES mswyers@TheTrademarkCompany.com
Submission	Answer
Filer's Name	Matthew H. Swyers
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Signature	/Matthew H. Swyers/
Date	06/29/2015
Attachments	Answer to Amended Pleading.pdf(162335 bytes)

**IN THE UNITED STATES PATENT AND TRADEMARK OFFICE
The Trademark Trial and Appeal Board**

In the matter of U.S. Registration 3,700,403
For the mark BONGO BI-LINGO BUDDY
Registered on the Principal Register on October 20, 2009

MWR Holdings, LLC,	:	
	:	
Petitioner,	:	
	:	
vs.	:	Cancellation No. 92059305
	:	
Stoner, Theodore A.,	:	
	:	
Registrant.	:	

ANSWER AND GROUNDS OF DEFENSE

COMES NOW Registrant, Theodore A. Stoner (hereinafter “Registrant”), by and through counsel, The Trademark Company, PLLC, and files its Answer and Grounds of Defense to the Amended Petition to Cancel and in response to Petitioner’s allegations states as follows:

ANSWER

Registrant denies the allegations set forth in the Introductory Paragraph of the Amended Petition to Cancel and demands strict proof thereof. In response to the specifically enumerated paragraphs, the Registrant states as follows:

1. Registrant is without knowledge of the allegations set forth in Paragraph 1 of the Amended Petition to Cancel and therefore denies the same.
2. Registrant admits the allegations set forth in Paragraph 2 of the Amended Petition to Cancel.
3. Registrant denies the allegations set forth in the last two sentences of Paragraph 3 as phrased and demands strict proof thereof; otherwise, Registrant admits the allegations set forth in Paragraph 3 of the Amended Petition to Cancel.

4. Registrant is without knowledge of the allegations set forth in the second sentence of Paragraph 4 of the Amended Petition to Cancel and therefore denies the same; otherwise, Registrant is without knowledge of the allegations set forth in Paragraph 4 of the Amended Petition to Cancel and therefore denies the same.

5. Registrant is without knowledge of the allegations set forth in Paragraph 5 of the Amended Petition to Cancel and therefore denies the same.

6. Registrant is without knowledge of the allegations set forth in Paragraph 6 of the Amended Petition to Cancel and therefore denies the same.

7. Registrant denies the allegations set forth in Paragraph 7 of the Amended Petition to Cancel and demands strict proof thereof.

8. Registrant is without knowledge of the allegations set forth in Paragraph 8 of the Amended Petition to Cancel and therefore denies the same.

9. Registrant denies the allegations set forth in Paragraph 9 of the Amended Petition to Cancel and demands strict proof thereof.

10. Registrant denies the allegations set forth in Paragraph 10 of the Amended Petition to Cancel and demands strict proof thereof.

11. Registrant denies the allegations set forth in Paragraph 11 of the Amended Petition to Cancel and demands strict proof thereof.

12. Registrant denies the allegations set forth in Paragraph 12 of the Amended Petition to Cancel and demands strict proof thereof.

13. Registrant admits the allegations set forth in Paragraph 13 of the Amended Petition to Cancel.

14. Registrant admits the allegations set forth in Paragraph 14 of the Amended Petition to Cancel and demands strict proof thereof.

15. Registrant is without knowledge of the allegations set forth in Paragraph 15 of the Amended Petition to Cancel and therefore denies the same.

16. Registrant denies the allegations set forth in Paragraph 16 of the Amended Petition to Cancel and demands strict proof thereof.

17. Registrant denies the allegations set forth in Paragraph 17 of the Amended Petition to Cancel and demands strict proof thereof.

18. Registrant denies the allegations set forth in Paragraph 18 of the Amended Petition to Cancel and demands strict proof thereof.

Registrant further denies all allegations not specifically, actually or constructively, admitted in the foregoing paragraphs of this Answer and Grounds of Defense.

WHEREFORE, Registrant prays that the Amended Petition to Cancel be dismissed.

Respectfully submitted this 29th day of June, 2015.

THE TRADEMARK COMPANY, PLLC

/Matthew H. Swyers/
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Counsel for Registrant

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vs.	:	Cancellation No. 92059305
	:	
Stoner, Theodore A.,	:	
	:	
Registrant.	:	

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that I caused a copy of the foregoing this 29th day of June, 2015 to
be served, via first class mail, postage prepaid, upon:

William W Stroeve
Greenberg Traurig LLP
200 Park Avenue, PO Box 677
Florham Park, NJ 07932-0677

/Matthew H. Swyers/
Matthew H. Swyers